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Counsel for Defendant
MICHAEL HIGGINBOTHAM

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,
Plaintiff,

v.

MICHAEL HIGGINBOTHAM,
Defendant.

CR-10-00703-MMC

STIPULATION OF THE PARTIES TO
PERMIT TRAVEL TO SAN FRANCISCO
BY DEFENDANT MICHAEL
HIGGINBOTHAM AND
~~{PROPOSED}~~ ORDER

STIPULATION OF THE PARTIES TO PERMIT TRAVEL TO SAN FRANCISCO

WHEREAS, defendant Michael Higginbotham (“Mr. Higginbotham”) has been released to a halfway house in Oakland, California pending resolution of the Petition for Revocation of supervised release, so that he may continue his employment, with the additional conditions that he be placed on electronic monitoring to include GPS, as directed by the U.S. Probation Office, and that he not travel to San Francisco, California pending resolution of the Petition for Revocation;

WHEREAS, Mr. Higginbotham has just had a newborn son, and he has requested to travel to San Francisco to sign the birth certificate and other documents related to the birth of his newborn son;

WHEREAS, Mr. Higginbotham will need to travel to San Francisco to attend the Status

Conference set in this matter for December 2, 2015, at 2:15 p.m., before the Honorable Maxine M. Chesney, and to attend other Status Conferences that may be set in this matter and the hearing on the Petition for Revocation, as well as to meet with his attorney at his attorney's offices in San Francisco in order to review the discovery in the case, including electronic documents, and to discuss and prepare defenses to the charges; and

WHEREAS, the parties have informed Mr. Higginbotham's U.S. Probation Officer of this Stipulation, and he does not object.

THEREFORE, THE PARTIES HEREBY STIPULATE that the conditions of Mr. Higginbotham's supervised release should be modified to provide that Mr. Higginbotham may travel to San Francisco to sign the birth certificate and other documents related to the birth of his newborn son, to attend Court hearings in this matter, and to meet with his attorney to prepare his defense, with the condition that all such travel to San Francisco be at the direction of his U.S. Probation Officer.

Dated: November 5, 2015

Respectively Submitted:

BORO LAW FIRM

/s/ Albert J. Boro, Jr.
ALBERT J. BORO, JR.

Attorney for Defendant
MICHAEL HIGGINBOTHAM

EILEEN M. DECKER
United States Attorney

/s/ Justin R. Rhoades*
JUSTIN R. RHOADES
Assistant United States Attorney


*Signed with permission.

~~PROPOSED~~ ORDER

FOR GOOD CAUSE SHOWN, the Court hereby modifies the conditions of defendant Michael Higginbotham's supervised release to allow Mr. Higginbotham to travel to San Francisco to sign the birth certificate and other documents related to the birth of his newborn son, to attend Court hearings in this matter, and to meet with his attorney to prepare his defense, with the condition that all such travel to San Francisco be at the direction of his U.S. Probation Officer.

IT IS SO ORDERED.

DATED: November 6, 2015


HON. MAXINE M. CHESNEY
UNITED STATES DISTRICT JUDGE